

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

In Re: ) Case No: 15-10806  
Ifeoma Nkemdi )  
 ) Chapter: Chapter 13  
Debtor )  
 ) Judge: Timothy A. Barnes

**NOTICE OF MOTION**

TO: See attached list

PLEASE TAKE NOTICE that on June 25<sup>th</sup>, 2020 at 1:30PM, I will appear before the Honorable Timothy A. Barnes, or any judge sitting in that judge's place, and present the **MOTION TO VACATE PAYROLL** a copy of which is attached

**This motion will be presented and heard telephonically.** No personal appearance in court is necessary or permitted. To appear and be heard telephonically on the motion, you must set up and use an account with Court Solutions, LLC. You can set up an account at [www.Court-Solutions.com](http://www.Court-Solutions.com) or by calling Court Solutions at (917) 746-7476.

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

By: /s/ Christopher Dyer

Christopher Dyer  
Geraci Law L.L.C.  
55 E. Monroe Street #3400  
Chicago, Illinois 60603  
312.332.1800  
ndil@geracilaw.com

**CERTIFICATE OF SERVICE**

I, Christopher Dyer, certify that I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown and by the method indicated on the list on June 15, 2020 before 5:30 PM.

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>In Re:</b>	)	<b>Case No:</b>	<b>15-10806</b>
<b>Ifeoma Nkemdi</b>	)	<b>Chapter:</b>	<b>Chapter 13</b>
	)	<b>Judge:</b>	<b>Timothy A. Barnes</b>
<b>Debtor</b>	)		

**LIST OF PARTIES SERVED**

Marilyn O. Marshall, 224 S. Michigan Ave. #800, Chicago, IL 60604

Office of the U.S. Trustee, 219 S. Dearborn, Suite 873, Chicago, Illinois 60604

Ifeoma I Nkemdi, 9321 S. Cregier Ave, Chicago, IL 60617

Chicago Public Schools, attn. Payroll, 42 W. Madison St., Chicago, IL 60603

IN THE UNITED STATES OF BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In Re: ) Case No: 15-10806  
Ifeoma Nkemdi )  
Debtor, ) Chapter: Chapter 13  
 )  
 ) Judge: Timothy A. Barnes

**MOTION TO VACATE ORDER FOR PAYROLL CONTROL ENTERED ON 8/22/2016**

NOW COMES the Debtor, Ms. Ifeoma Nkemdi (the "Debtor"), by and through her attorneys, Geraci Law L.L.C., to present her **MOTION TO VACATE ORDER FOR PAYROLL CONTROL ENTERED ON 8/22/2016 PURSUANT TO FED. R. BANKR. P. 9024**, and states as follows:

1. This Court has jurisdiction pursuant to 11 U.S.C. 1334 and this is a "core proceeding" under 28 U.S.C. 157(b).
2. The Debtor filed a petition for bankruptcy protection under Chapter 13 of the US Bankruptcy Code and a plan of reorganization on 03/26/2015.
3. The plan was confirmed on 08/17/2015.
4. On 8/22/2016, the payroll control order was entered at the Debtor's consent. See Exhibit A.
5. The Debtor has completed all required plan payments and is awaiting only the Trustee's final audit for the case to close.

WHEREFORE, the Debtor, Ms. Ifeoma Nkemdi prays that this Court enter an order vacating the order for payroll control entered on 8/22/2016 and for such further additional relief that this Court may deem just and proper.

/s/ Christopher Dyer  
Christopher Dyer

**Attorneys for the Debtor**

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